



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

October 28, 2020

Dr. Ranyee Chiang  
Director of Meteorology and Measurements  
Bay Area Air Quality Management District  
375 Beale Street  
San Francisco, California 94105

Dear Dr. Chiang:

Thank you for your submission of the Bay Area Air Quality Management District (BAAQMD) *2019 Air Monitoring Network Plan* on July 1, 2020. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve a system modification for the following site: Hayward (AQS ID: 06-001-2001). More information about this approval is included in enclosure B.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information provided does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Enclosure A (*A. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in enclosure A require attention in order to improve next year's plan.

We also want to thank you for your timely submission of the *Five-Year Assessment of the Fixed-Site Air Monitoring Network* for the BAAQMD, as required under 40 CFR Part 58.10. We recognize that preparing the network assessment was a significant project and we appreciate your effort.

All comments conveyed via this letter and enclosures should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Bilal Qazzaz (415) 947-3532.

Sincerely,

Gwen Yoshimura, Manager  
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Checklist
- B. Approval of BAAQMD Request to Discontinue Hayward Air Monitoring Station as a State and Local Air Monitoring Station and Convert to a Special Purpose Monitor

cc (via email): Charles Knoderer, BAAQMD  
Kate Hoag, BAAQMD  
Jin Xu, California Air Resources Board (CARB)

## A. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated April 8, 2020)

Year: 2020

Agency: Bay Area Air Quality Management District (BAAQMD)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process.
Green	item requires attention in order to improve next year’s plan.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
<b>GENERAL PLAN REQUIREMENTS</b>					
1.	Submit plan by July 1 <sup>st</sup>	58.10 (a)(1)	Yes, Cover Letter, Submittal Email	Y	Plan was submitted July 1, 2020  *Note: The cover page of the plan submitted July 1, 2020, says “July 1, 2019.” Please make sure future plans reflect the appropriate date on the cover page.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Yes, cover letter	Y	No comments received
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Yes, p.18	Y	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	NA	NA	
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14			
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		NA	NA – no modifications since last approval	No system modifications have been approved since the last ANP approval. BAAQMD included documentation for relocation of the Napa site, which was approved by EPA in June 2015 and was completed in April 2018. BAAQMD also included documentation of EPA’s approval to discontinue Pb monitoring at San Jose-Jackson and approval to discontinue NO <sub>y</sub> monitoring at the San Jose NCore site to

<sup>1</sup> Unless otherwise noted.

<sup>2</sup> Response options: NA (Not Applicable), Yes, No, or Incomplete.

<sup>3</sup> Assuming the information is correct.

<sup>4</sup> Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
					place the monitor at Livermore for PAMS, which were approved in previous years. See Appendices E-H of BAAQMD's plan.
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes, p.48-51		
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Yes, p.53	Y	
9.	Annual data certification submitted	58.15	Yes, p.53	Y	
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. <sup>5</sup>	58.11 (a)(2)	Yes, p.18, Detailed Site Info	Y	
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. <sup>6</sup>	58.20 (c)	Yes, p. 31, 35, 39,	Y	
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	Yes, p.20, Appendices A, B, C, D	Y	BAAQMD shares monitoring requirements with Monterey Bay Air Resources District (MBARD) for the San Jose-Sunnyvale-Santa Clara CBSA. Shared monitoring agreement to meet PM10 requirements.
<b>GENERAL PARTICULATE MONITORING REQUIREMENTS (PM<sub>10</sub>, PM<sub>2.5</sub>, Pb-TSP, Pb-PM<sub>10</sub>)</b>					
13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Yes, Detailed Station Info	Y	
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Yes, Detailed Station Info	Y	

<sup>5</sup> Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

<sup>6</sup> This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]				

#### **PM<sub>2.5</sub> –SPECIFIC MONITORING REQUIREMENTS**

15.	Document how states and local agencies provide for the review of changes to a PM <sub>2.5</sub> monitoring network that impact the location of a violating PM <sub>2.5</sub> monitor.	58.10 (c)	Yes, p.52	Y	
16.	Identification of any PM <sub>2.5</sub> FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM <sub>2.5</sub> with <u>NAAQS-comparable</u> monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	NA	NA	
17.	Minimum # of monitoring <b>sites</b> for PM <sub>2.5</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Yes, p.27	Y	
18.	Requirements for continuous PM <sub>2.5</sub> monitoring (number of monitors and collocation)	App. D 4.7.2	Yes, p.24	Y	
19.	FRM/FEM/ARM PM <sub>2.5</sub> QA collocation	App. A 3.2.3	Yes, p.30	Y	BAAQMD previously did not meet this requirement in 2018 but has since installed an FRM at Concord on February 8, 2019 to meet this requirement.
20.	PM <sub>2.5</sub> Chemical Speciation requirements for official STN sites	App. D 4.7.4	Yes, p.170-173	Y	
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM <sub>2.5</sub> NAAQS as described in Part 58.30	58.10 (b)(7)	Yes, Detailed Station Info	Y	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
22.	Required PM <sub>2.5</sub> sites represent area-wide air quality	App. D 4.7.1(b)	Yes, p.24	Y	
23.	For PM <sub>2.5</sub> , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Yes, p.28	Y	
24.	If additional SLAMS PM <sub>2.5</sub> is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Yes, p.24	Y	
25.	States must have at least one PM <sub>2.5</sub> regional background and one PM <sub>2.5</sub> regional transport site.	App. D 4.7.3	Yes	NA	While this is a State requirement, BAAQMD indicates transport PM <sub>2.5</sub> sites within their PQAQ. BAAQMD does not have a regional background site.
26.	Sampling schedule for PM <sub>2.5</sub> - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Yes, Detailed Station Info	Y	BAAQMD's PM <sub>2.5</sub> monitors are continuously operating, with the exception of the QA collocated FRM at San Jose-Jackson. The FRM samples at 1:3 frequency, meeting the requirement for manual samplers at NCore sites. The STN-affiliated speciation sampler at San Jose-Jackson also samples at the required 1:3 frequency.
27.	Frequency of flow rate verification for automated and manual PM <sub>2.5</sub> monitors	App. A 3.2.1	Yes, Detailed Station Info	Y	

28.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for PM <sub>2.5</sub> monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Yes, Detailed Station Info	Y	
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#### PM<sub>10</sub> –SPECIFIC MONITORING REQUIREMENTS

29.	Minimum # of monitoring sites for PM <sub>10</sub> [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Yes, p. 30, Appendix B	Yes	<p>Monitoring agreement used to meet PM10 requirements for the San Jose-Sunnyvale-Santa Clara MSA is in Appendix B.</p> <p>BAAQMD notes a maximum concentration in 2019 at the Hollister site was affected by a rare high pressure event bringing in air to the basin from SJV. District is working with MBARD to assess community and network needs in the 5-year Network Plan. Please work with EPA to ensure that minimum monitoring requirements continue to be met in the future.</p> <p>BAAQMD's discussion notes that certain sites were impacted by wildfire smoke in 2017 and 2018 and this affects minimum monitoring requirements in these MSAs. Please work with EPA to ensure that minimum monitoring requirements continue to be met in the future.</p>
30.	Manual PM <sub>10</sub> method collocation (note: continuous PM <sub>10</sub> does not have this requirement)	App. A 3.3.4	Yes, p.34	Y	
31.	Sampling schedule for PM <sub>10</sub>	58.10 (b)(4); 58.12(e); App. D 4.6	Yes, Detailed Station Info	Y	
32.	Frequency of flow rate verification for automated and manual PM <sub>10</sub> monitors	App. A 3.3.1 and 3.3.2	Yes, Detailed Station Info	Y	
33.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for PM <sub>10</sub> monitors [Note: 5 -7 month interval is recommended but	App. A 3.3.3	Yes, Detailed Station Info	Y	



	not a requirement.]				
Pb –SPECIFIC MONITORING REQUIREMENTS					
34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	Yes, p.45-47	N	The Palo Alto site was closed on December 23, 2014 due to lease termination. During FAA review it was determined that the Pb sampler did not meet FAA regulations. Monitoring at the airport has not resumed. The San Carlos Airport II site was also discontinued as of April 11, 2017. BAAQMD is no longer allowed to access the site due to an expired lease. BAAQMD indicates they have been unable to renegotiate the lease due to circumstances beyond their control.  BAAQMD is continuing to work with EPA to find a suitable alternative for both sites.
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	Yes, p.45-47	N	The QA collocated monitor ended operation with the termination of the San Carlos Airport II site in April 2017. BAAQMD has indicated they are unable to place a QA collocated monitor at the remaining operational Pb-TSP site (Reid Hillview).
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM <sub>10</sub> in lieu of Pb-TSP	58.10 (b)(11)	NA	NA	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Yes, Detailed Station Info	Y	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Yes, Detailed Station Info	Y	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Yes, Detailed Station Info	Y	
41.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for Pb monitors	App A 3.4.3	Yes, Detailed Station Info	Y	

	[Note: 5 -7 month interval is recommended but not a requirement.]				
<b>GENERAL GASEOUS MONITORING REQUIREMENTS</b>					
42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Yes, Detailed Station Info	Y	
43.	Date of Annual Performance Evaluation (gaseous) conducted in <b>the previous CY</b>	App. A 3.1.2	Yes, Detailed Station Info	Y	
<b>O<sub>3</sub> –SPECIFIC MONITORING REQUIREMENTS</b>					
44.	Minimum # of monitoring sites for O <sub>3</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Yes, p.20-21	Yes	
45.	Identification of maximum concentration O <sub>3</sub> site(s)	App D 4.1 (b)	Yes, Detailed Station Info	Yes	
46.	Sampling season for O <sub>3</sub> (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Yes, Detailed Station Info; pg 56	Insufficient information to judge	Detailed Station Information tables indicate that all District sites are sampling year-round. However, pg. 56 of the ANP states that “EPA has granted a waiver to the Air District so that some ozone sites in the Bay Area are not required to run during the winter.” Waivers must be renewed annually. Please revise this statement in future plans to accurately reflect whether BAAQMD is operating sites seasonally, and if so, please submit a waiver request to EPA.  Not needing attention: San Ramon SPM O <sub>3</sub> monitor is listed and described as operating seasonally; no O <sub>3</sub> season waiver is required for this SPM monitor.
47.	An Enhanced Monitoring Plan for O <sub>3</sub> , if	58.10 (a)(11);	NA	NA- not required	District began unofficial PAMS monitoring

	applicable, no later than October 1, 2019 or two years following the effective date of a designation to a classification of Moderate or above O <sub>3</sub> nonattainment, whichever is later.	App D 5 (h)			in 2010 and 2012
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#### NO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS

48.	Minimum monitoring requirements for area-wide NO <sub>2</sub> monitor in location of expected highest NO <sub>2</sub> concentrations representing neighborhood or larger scale	App D 4.3.3	Yes, p.38	Yes	
49.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO <sub>2</sub>	App D 4.3.4	Yes, p.38-39	Yes	
50.	Identification of required NO <sub>2</sub> monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Yes, Detailed Station Info	Yes	

#### NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:

51.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Yes, p.41	Y	BAAQMD is meeting the requirement, but please note that Pleasanton is included in the number of active near-road NO <sub>2</sub> , CO, and PM <sub>2.5</sub> monitors for the San Francisco-Oakland-Berkeley MSA provided in Tables 2-6, 2-12, and 2-13. These monitors are SPMs and cannot be used to meet minimum monitoring requirements and therefore these monitors should not be counted among the active near-road monitors for this MSA. Please correct this in future annual network plans.
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Y, p.43	Y	
53.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Yes, p.26	Y	

In CBSAs ≥ 1 million and AADT ≥ 250K, the following near-roadway minimum monitoring requirements apply:

54.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Yes, p.41	Y	BAAQMD currently operates one near-road site with NO <sub>2</sub> , CO, and PM <sub>2.5</sub> monitors in the San Jose-Sunnyvale-Santa Clara MSA at San Jose-Knox. This MSA recently surpassed the AADT requirement for a
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					second near-road NO <sub>2</sub> monitor. BAAQMD's 2020 5-year network assessment discusses their plan to address this requirement.  The BAAQMD's 2020 5-year network assessment states: "The Air District will work with EPA to determine whether there are resources to fund additions to the near-road NO <sub>2</sub> network, or if there is discretion for a waiver given the characterization of near road environments already occurring in the Bay Area."
55.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Yes, p.43	Y	
56.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Y, p.26	Y	
In CBSAs $\geq 1$ million and $\leq 2.5$ million AND AADT $< 250K$ , the following near-roadway minimum monitoring requirements apply:					
57.	One NO <sub>2</sub> monitor	App. D 4.3.2(a); 58.13(c)(3)	NA	NA	
58.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
59.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA	NA	
<b>SO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS</b>					
60.	Minimum monitoring requirements for SO <sub>2</sub> based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Yes, p.34-36	Y	
61.	Monitors used to meet Data Requirements Rule	51.1203(c)	Y, p.35	Y	EPA approved the existing Martinez SLAMS SO <sub>2</sub> monitor to meet BAAQMD's requirement for monitoring under the Data Requirements Rule on December 6, 2016.
<b>NCORE –SPECIFIC MONITORING REQUIREMENTS</b>					
62.	NCore site and all required parameters	App. D 3(b)	Yes, p.162-163,	Y	EPA previously approved a waiver to use

	operational: year-round O <sub>3</sub> , SO <sub>2</sub> , CO, NO <sub>y</sub> , NO, PM <sub>2.5</sub> mass, PM <sub>2.5</sub> continuous, PM <sub>2.5</sub> speciation, PM <sub>10-2.5</sub> mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO <sub>y</sub> waiver, if applicable.		Appendix E, F		meteorological data from the San Jose Airport as official data for the NCore site. EPA has also previously approved BAAQMD's request for a waiver to measure NO <sub>y</sub> at Livermore instead of at the NCore site when required PAMS measurements begin at Livermore.
63.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2021.	58.10 (a)(10); 58.13 (h)	Yes, p.164-169, Appendix I	Y	Initial PAMS network plan is included in Appendix I

**SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)**

64.	AQS site identification number for each site	58.10 (b)(1)	Yes, Detailed Station Info	Y	
65.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes, Detailed Station Info	Y	
66.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes, Detailed Station Info	Y	
67.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Station Info	Y	
68.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Yes, Detailed Station Info	Y	
69.	Site type for each monitor	App D 1.1.1	Yes, Detailed Station Info	Y	
70.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Station Info	Y	
71.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Yes, Detailed Station Info	Y	
72.	Parameter code for each monitor	Needed to	Yes, Detailed Station	Y	

		determine if other requirements (e.g., min # and collocation) are met	Info		
73.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes, Detailed Station Info	Y	
74.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Site Info	Y	
75.	Distance of monitor from nearest road	App E 6	Yes, Detailed Site Info	Y	
76.	Traffic count of nearest road	App E	Yes, Detailed Site Info	Y	
77.	Groundcover	App E 3(a)	Yes, Detailed Site Info	Y	
78.	Probe height	App E 2	Yes, Detailed Site Info	Y	
79.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Yes, Detailed Site Info	Y	
80.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes, Detailed Site Info	Y	
81.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes, Detailed Site Info	Y	
82.	Distance from the drip line of closest tree(s)	App E 5	Yes, Detailed Site Info	Y	<p>The plan states that the San Jose-Knox near-road site monitors are 8m from the drip line of the closest tree. EPA verified during a Technical Systems Audit that the tree in question is located on the opposite side of the monitoring station from the road, and therefore the proximity is acceptable for this near-road site.</p> <p>The Crockett SO<sub>2</sub> SPM monitor is also &lt;10m from the drip line; however, this SPM</p>

					is not required to meet Appendix E.
83.	Distance to furnace or incinerator flue	App E 3(b)	Yes, Detailed Site Info	Y	Distances from flues are included in the plan. Without any indication in the plan otherwise, EPA assumes that the distance to the flue and fuel burned does not constitute an inappropriate source at these sites.
84.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes, Detailed Site Info	Y	
85.	Probe material (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Detailed Site Info	Y	
86.	Residence time (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Detailed Site Info	Y	

### Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	<b>None</b>
Were comments included in ANP submittal?	<b>N/A</b>
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	<b>N/A</b>
Were S/L/T responses to substantive comments included in ANP submittal?	<b>N/A</b>
Were the S/L/T responses to substantive comments adequate?	<b>N/A</b>
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	<b>N/A</b>
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	<b>N/A</b>

## **B. Approval of BAAQMD Request to discontinue Hayward Air Monitoring Station as a State and Local Air Monitoring Station and convert to a Special Purpose Monitor**

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors and per 40 CFR 58.11(c), a change in the designation of a monitoring site from SLAMS to SPM requires approval of the Regional Administrator. BAAQMD's Hayward station (AQS ID: 06-001-2001) consists of one criteria pollutant monitor for O<sub>3</sub>. Discontinuation of the Hayward monitor as a SLAMS was specifically reviewed under 40 CFR 58.14(c), which states that requests for discontinuation "may also be approved on a case-by-case basis if discontinuance does not compromise data collection needed for implementation of a [National Ambient Air Quality Standard (NAAQS)] and if the requirements of appendix D to this part, if any, continue to be met."

In evaluating this request, EPA reviewed the information provided by BAAQMD in their annual network plan submitted July 1, 2020 and certified O<sub>3</sub> data submitted to EPA's Air Quality System (AQS) associated with the four most recently available 2015 8-hour O<sub>3</sub> design values (2016-2019) design values. This monitor was in attainment of the 2015 8-hour O<sub>3</sub> NAAQS for the period of 2016-2019 and was found to have lower design values than the highest monitoring site in Alameda County, Livermore (AQS ID: 06-001-007). With the discontinuation of O<sub>3</sub> monitoring at the Hayward site, BAAQMD will continue to operate four O<sub>3</sub> SLAMS monitors in the San Francisco-Oakland-Berkeley Metropolitan Statistical Area (MSA), which exceeds the minimum monitoring requirement for this MSA.

Based on these analyses, the discontinuance of the O<sub>3</sub> monitor at Hayward does not compromise data collection needed for implementation of the 2015 8-hour O<sub>3</sub> NAAQS and will not prevent BAAQMD from meeting 40 CFR 58 Appendix D requirements. Therefore, EPA approves BAAQMD's discontinuation of the Hayward O<sub>3</sub> SLAMS monitor on a case-by-case basis per 40 CFR 58.14(c). Please include this network modification and EPA's approval in your next annual network plan.